

Pacific Choice Seafood
1 Commercial St.
Eureka, CA 95501

September 20, 2017

David Adams
Source Control
City of Eureka
1301 Hilfiker Ln.
Eureka, CA 95503

RE: Notice of Violation/Corrective Action dated 9/19/2017


Dear Mr. Adams

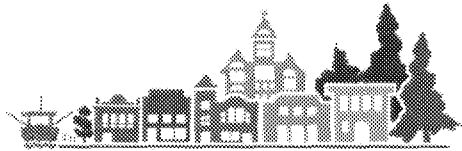
As requested in the above referenced Notice of Violation, please accept our written response below:

We believe our team members did not do a dry clean up before washing down the floors in our fillet processing room. We also believe the drain baskets were pulled allowing the tags and gloves to go out to the lift station. Regarding the weekly report during shrimp processing operations, we have stopped producing shrimp as of 8/12/2017 for this season. Specific steps taken toward correcting the violations include:

1. General cleanup at the end of the production shift will be monitored by our shift supervisors. Heightened awareness has been implemented on dry clean up to prevent solids from going down the processing drains.
2. Documented training will be completed by 9/22/2017 by all departments using the visual supplied by the Eureka Source Control Inspector.
3. We will designate one person who will be responsible to submit required weekly reports during periods of shrimp processing for our 2018 shrimp season starting mid-April.
4. As stated previously, we are currently working with our corporate engineers and Brian Gerving, Director of Public Health for the City of Eureka, on diverting all plant production water to our waste water treatment plant, where we will be able to capture all foreign material before being released to the city.

Sincerely,


John King
General Manager



CITY of EUREKA

September 19, 2017

Mr. John King
Pacific Choice Seafood
1 Commercial Street
Eureka, CA 95501

CITY OF EUREKA PUBLIC WORKS DEPARTMENT

531 K Street • Eureka, California 95501-1146 • Fax 707-441-4202
Administration: 707-441-4203 • Engineering: 707-441-4194
Building: 707-441-4155 • Utility Operations: 707-441-4364
publicworks@ci.eureka.ca.gov • www.ci.eureka.ca.gov

COPY

RE: NOTICE OF VIOLATION/CORRECTIVE ACTION

Dear Mr. King,

Enclosed is a Notice of Violation regarding Wastewater Discharge Permit #37. Please be advised that to avoid administrative penalties, Pacific Choice Seafood must fully comply with all terms stated in this Notice. Administrative, civil, and criminal penalties for violations of pretreatment standards and requirements are described in the Eureka Municipal Code (EMC), Title 5, Chapter 50. *changed and sent*

On August 18, 2017, *a* routine check and cleaning was performed *at* of the Commercial Street lift station. During this inspection, City of Eureka collection system crews identified and removed solid wastes not compatible with the sanitary sewer system. Some of these substances were identifying tags or labels that stated "undefined product" and disposable gloves. A follow-up inspection was performed to determine if these items may be originating at Pacific Choice Seafood. During the inspection, General Manager John King and staff showed Source Control personnel that the labels on their products did not match the labels present in the lift station at that time.

On September 12, 2017, another routine check and cleaning found more of the "undefined product" labels and gloves as well as label and identification tags that clearly identify as originating from Pacific Choice Seafood. This is a violation of the EMC and Wastewater Discharge Permit #37. (see enclosed photo)

A review of the conditions set forth in Wastewater Discharge Permit #37 determined that Pacific Choice Seafood has also failed to submit required weekly reports during periods of shrimp processing operations. This is also a violation of the EMC and Wastewater Discharge Permit #37.

Your cooperation in resolving this matter is greatly appreciated. Please contact me at (707) 441-4362 if you have any questions or concerns regarding the Notice.

Sincerely,

David Adams
Source Control Inspector

Encl: Notice of Violation; photo of Pacific Choice Seafood identification tags from lift station

Engineering
Construction
Development
Transportation

Field Operations
Water Distribution
Wastewater Collection
Equipment Operations

Building
Construction Regulation
Code Enforcement

Utility Operations
Water and Wastewater Treatment
Stormwater
Pretreatment

PACIFIC CHOICE SEAFOOD
NOTICE OF VIOLATION

LEGAL AUTHORITY

The following Findings are made and Order issued pursuant to the authority vested in the City of Eureka City Manager under the City of Eureka Municipal Code (EMC) Title 5, Chapter 50, Sewers. This Order is based on findings of violation of the conditions of the Wastewater Discharge Permit issued under Section 50.051 of the City's Municipal Code.

FINDINGS

- 1) The City of Eureka owns and operates a Publicly Owned Treatment Works which could be adversely impacted by discharges from Pacific Choice Seafood and other industrial users, and has implemented a pretreatment program to control such discharges.
- 2) Under this pretreatment program Pacific Choice Seafood was issued Wastewater Discharge Permit Number 37 on October 3, 2014 that contains prohibitions, restrictions, limitations and self-monitoring requirements related to the discharge of wastewater to the sanitary sewer.
- 3) Pursuant to the EMC and the above-referenced permit, data on the compliance status of Pacific Choice Seafood is collected by the City of Eureka.
- 4) This data shows that Pacific Choice Seafood has violated EMC Section 50.020(B), 50.055 and Wastewater Discharge Permit Number 37 in the following manner: Solid waste greater than one inch in any dimension was improperly disposed of and/or bypassed pretreatment screening controls and entered the sanitary sewer. Required weekly reports from the shrimp processing logbook specified in Permit #37, Part 1, Section M, have not been received.

PACIFIC CHOICE SEAFOOD IS HEREBY NOTIFIED THAT:

- 1) It is in violation of Wastewater Discharge Permit Number 37 and the Sewer Use Ordinance of the City of Eureka.
- 2) It is required to **notify this office in writing** within seven (7) working days of receipt of this Notice of the reason for the wastewater discharge violation and a written response to this Notice which at a minimum address the following points:
 - a. Identification of the route of entry of the incompatible solid materials into the sewer system and additional engineering measures the permittee shall implement to eliminate the possibility of solid wastes of the nature listed above bypassing the existing screens.
 - b. Status of the shrimp processing operations logbook and steps taken to comply with the reporting requirements specified in Wastewater Discharge Permit #37.
- 3) Failure to respond within the time frames indicated will constitute a further violation of the Sewer Use Ordinance and may subject Pacific Choice Seafood to administrative fines in the amount of one thousand dollars (\$1000) per day per violation in accordance with section 50.123 (F) of the EMC.

This notice is effective upon receipt by Pacific Choice Seafood.

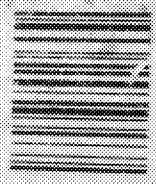
Correspondence regarding this notice shall be sent to:

Source Control
City of Eureka
4301 Hilfiker Ln.
Eureka, CA 95503
sourcecontrol@ci.eureka.ca.gov



Commercial Street Lift Station 8-18-17

AVILA, DE HERRERA, AMELIA



PACIFIC GROUP
EMPLOYEE

DICARLO SEAFOOD



11 00027241120113 3202 000000 11 170829 (21) 100004872082

SAE - EFISH

N/A
FRES
3-CUT 11 0"
4-5 PCUM
CNF 1

51.00 LBS

N/A
N/A
29 AUG 2017 (PRODUCED)
100 2417 E

PACIFIC GROUP SEAFOOD CA 95501

PRODUCT OF USA WILD

METZLER, JOHN



PACIFIC GROUP
EMPLOYEE



PACIFIC CHOICE SEAFOODS CO.

1 COMMERCIAL ST. • EUREKA, CA 95501

(707) 442-2981 • FAX (707) 442-2985

FAMILY COMPANIES & WHOLLY OWNED SUBSIDIARIES

Pacific Alaska Shellfish, Inc.
Washington Crab Producers, Inc.
Pacific Coast Seafoods Company
Pacific Surimi Co., Inc.
Pacific Shrimp Co.
Pacific Choice Seafood Company
Pacific Oyster Co.
Pacific Smoking Co.
Pacific Sea Food Co.
Pacific Fresh Sea Food Company
Pacific Group Transport Co.
Pacific Seafood Group
Jake's Famous Crawfish & Seafood
Bandon Pacific
Live Seafoods Co.

DISTRIBUTION CENTERS

Seattle, Wa.
Spokane, Wa.
Clackamas, Ore.
Portland, Ore.
Medford, Ore.
Sacramento, Calif.
Fresno, Calif.

PRODUCTION FACILITIES

Kenai, Alaska
Westport, Wa.
Warrenton, Ore.
Bay City, Ore.
Salem, Ore.
Albany, Ore.
Newport, Ore.
Charleston, Ore.
Bandon, Ore.
Eureka, Calif.

RECEIVING STATIONS

Kenai, Alaska
Blaine, Wa.
Westport, Wa.
Warrenton, Ore.
Garibaldi, Ore.
Newport, Ore.
Charleston, Ore.
Bandon, Ore.
Brookings, Ore.
Crescent City, Calif.
Eureka, Calif.
San Francisco, Calif.

BRANDS

Pacific Fresh
Pacific Smoking Co.
Snow Mist
Sea Rock
Jake's Famous
Crawfish & Seafood
Newport Shrimp
Bandon Bay Fisheries
Bandon Fisheries
Bandon Gold
Ocean Fresh
S&S
Nemesis

Pacific Choice Seafood
1 Commercial St.
Eureka, CA 95501

August 21, 2017

Clay Yerby
City of Eureka
Public Works Department
531 K Street
Eureka, CA 95501

RE: Notice of Violation/Corrective Action dated 8/17/2017

Dear Mr. Yerby

As requested in the above referenced Notice of Violation, please accept our written response below:

We believe a team member on our Sanitation Team may have removed catch baskets and drain plugs before performing dry cleanup of all material. This issue has been readdressed with our entire Sanitation Team. A signed copy of the training by all sanitation team members as well as the 2nd shift production manager is attached with this response. Specific steps taken toward correcting the violation include:

1. All sanitation cleanings are monitored and documented. Heightened awareness has been implemented on dry clean up to prevent solids from going down the drains. In addition, sanitation personnel must receive verbal permission after inspection from their supervisor before pulling any plugs to the city sewer.
2. All shrimp waste outside the berm is squeegeed and shoveled into a tote and taken to our shell waste truck.
3. Training occurred with the sanitation teams on the evenings of 8/10/2017. Please find attached documentation of training with this response.
4. Upon inspection of equipment on 8/10/2017, all baskets, and pumps were found to be operational and in good repair.
5. Since last shrimp season, we have modified and replaced all water flumes to better contain and flow shrimp shells to avoid contact with floor drains.
6. We are currently working with our corporate engineers and Brian Gerving, Director of Public Health for the City of Eureka, on diverting all plant production water to our waste water treatment plant.

Sincerely,

John King
General Manager



PRETREATMENT FACILITY INSPECTION REPORT

GENERAL INFORMATION

Business Name: Pacific Choice
Address: #1 Commercial St. same time both days
Date: 8-10-17 / 8-11-17 Time In: 2:30 Time Out: 3:30
Persons Present During Inspection: David Adams / Clay Yerby Title: Source Control
Name: John King Title: General Manager
Industry Contact Name: ✓ Title: ✓
Inspection Type: (A) Scheduled (B) Unscheduled (C) Emergency (D) Pretreatment Division Monitoring (E) Self-Monitoring

INSPECTION SUMMARY

Purpose: Visual and verbal inspection of shrimp processing system. Collections crew recently had to un-clog lift station adjacent to Pacific Choice. Clog was determined to be caused by excess shrimp shells and debris from processing.

Findings: Sanitation crew possibly removing plugs in floor drains during clean-up. System and area was clean and orderly as no processing currently being performed. Will return 8-11-17 to witness processing. Ultimately a Notice of Violation will be issued.

8/11/17: Toured processing of shrimp and fish. Staff was engaging and thorough in presenting process as well as answering questions. Source Control is appreciative.

SIGNATURES

Inspector: [Signature]

Industry Contact: [Signature]



CITY OF EUREKA
PUBLIC WORKS DEPARTMENT

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publicworks@ci.eureka.ca.gov • www.ci.eureka.ca.gov

August 17, 2017

Mr. John King
Pacific Choice Seafood
1 Commercial Street
Eureka, CA 95501

RE: NOTICE OF VIOLATION/CORRECTIVE ACTION

Dear Mr. King,

Enclosed is a Notice of Violation regarding Wastewater Discharge Permit #37. Please be advised that to avoid administrative penalties, Pacific Choice Seafood must fully comply with all terms stated in this Notice. Administrative, civil, and criminal penalties for violations of pretreatment standards and requirements are described in the Eureka Municipal Code (EMC), Title 5, Chapter 50.

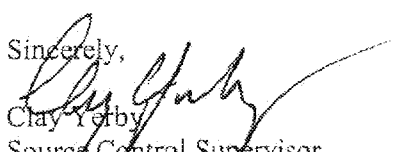
On July 19, 2017 and again on August 8, 2017, City of Eureka collection system crews responded to high wetwell level alarms at the Commercial Street Lift Station. In both instances the alarms were the result of shrimp shells causing a blockage in the lift station pumping system.

During Source Control inspections on August 10, 2017 and August 11, 2017 inspectors were shown the area where shrimp are cooked, and shelled. This is where most of the shrimp waste is generated. General Manager John King, explained that the sanitation night crew might be removing the screens on floor drains within the bermed shrimp cooking/shelling area during cleaning, and therefore shrimp waste is discharged to the sanitary sewer. Inspectors also noticed that there was significant shrimp waste outside the bermed area. This is a violation of the EMC. In the future if City crews are required to respond to collection system malfunctions caused by the discharge from Pacific Choice Seafood, the City of Eureka will bill Pacific Choice Seafood for all costs it incurs to correct the malfunction.

On October 31, 2016, Pacific Choice Seafood was issued a Notice of Violation resulting from excessive amounts of shrimp shells entering its treatment plant headworks and impacting the plants screening system. In response, Pacific Choice Seafood listed four actions it would take in order to correct the excessive shrimp waste discharges. It's apparent that the listed programmatic measures did not correct the problem.

Your cooperation in resolving this matter is greatly appreciated. Please contact me at (707) 441-4362 if you have any questions or concerns regarding the Notice.

Sincerely,


Clay Yerby
Source Control Supervisor

Cc:
Michael Hansen, Deputy Director of Public Works, Utilities Operations



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Engineering
Construction
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Transportation

Field Operations
Water Distribution
Wastewater Collection
Equipment Operations

Building
Construction Regulation
Code Enforcement

Utility Operations
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Stormwater
Pretreatment

PACIFIC CHOICE SEAFOOD
NOTICE OF VIOLATION

LEGAL AUTHORITY

The following Findings are made and Order issued pursuant to the authority vested in the City of Eureka City Manager under the City of Eureka Municipal Code (EMC) Title 5, Chapter 50, Sewers. This Order is based on findings of violation of the conditions of the Wastewater Discharge Permit issued under Section 50.051 of the City's Municipal Code.

FINDINGS

- 1) The City of Eureka owns and operates a Publicly Owned Treatment Works which could be adversely impacted by discharges from Pacific Choice Seafood and other industrial users, and has implemented a pretreatment program to control such discharges.
- 2) Under this pretreatment program Pacific Choice Seafood was issued Wastewater Discharge Permit Number 37 on October 3, 2014 that contains prohibitions, restrictions, limitations and self-monitoring requirements related to the discharge of wastewater to the sanitary sewer.
- 3) Pursuant to the EMC and the above-referenced permit, data on the compliance status of Pacific Choice Seafood is collected by the City of Eureka.
- 4) This data shows that Pacific Choice Seafood has violated EMC Section 50.020(B), 50.055 and Wastewater Discharge Permit Number 37 in the following manner: Shrimp waste was inadequately disposed of in the Pacific Choice waste piping system and as a result was discharged into the sanitary sewer system which blocked the City's Commercial Street lift station.

PACIFIC CHOICE SEAFOOD IS HEREBY NOTIFIED THAT:

- 1) It is in violation of Wastewater Discharge Permit Number 37 and the Sewer Use Ordinance of the City of Eureka.
- 2) It is required to **notify this office in writing** within seven (7) working days of receipt of this Notice of the reason for the wastewater discharge violation and a written response to this Notice which at a minimum address the following points:
 - a. Additional engineering measures the permittee shall implement to eliminate the possibility of bypassing the existing screens.
 - b. Additional engineering measures to capture seafood waste solids from the waste discharge drains outside the shrimp shelling/cooking bermed area.
- 3) Failure to respond within the time frames indicated will constitute a further violation of the Sewer Use Ordinance and may subject Pacific Choice Seafood to administrative fines in the amount of one thousand dollars (\$1000) per day per violation in accordance with section 50.123 (F) of the EMC.

This notice is effective upon receipt by Pacific Choice Seafood.

Correspondence regarding this notice shall be sent to:

**Source Control
City of Eureka
4301 Hilfiker Ln.
Eureka, CA 95503**



Pacific Chord

taken from clog of lift station out front

August 2017 from sector

ED_006495_00002306-00011



PACIFIC CHOICE SEAFOODS CO.

1 COMMERCIAL ST. • EUREKA, CA 95501

(707) 442-2981 • FAX (707) 442-2985

FAMILY COMPANIES & WHOLLY OWNED SUBSIDIARIES

Pacific Alaska
Shellfish, Inc.
Washington Crab
Producers, Inc.
Pacific Coast
Seafoods Company
Pacific Surimi Co., Inc.
Pacific Shrimp Co.
Pacific Choice
Seafood Company
Pacific Oyster Co.
Pacific Smoking Co.
Pacific Sea Food Co.
Pacific Fresh
Sea Food Company
Pacific Group
Transport Co.
Pacific Seafood Group
Jake's Famous
Crawfish & Seafood
Bandon Pacific
Live Seafoods Co.

DISTRIBUTION CENTERS

Seattle, Wa.
Spokane, Wa.
Clackamas, Ore.
Portland, Ore.
Medford, Ore.
Sacramento, Calif.
Fresno, Calif.

PRODUCTION FACILITIES

Kenai, Alaska
Westport, Wa.
Warrenton, Ore.
Bay City, Ore.
Salem, Ore.
Albany, Ore.
Newport, Ore.
Charleston, Ore.
Bandon, Ore.
Eureka, Calif.

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Kenai, Alaska
Blaine, Wa.
Westport, Wa.
Warrenton, Ore.
Garibaldi, Ore.
Newport, Ore.
Charleston, Ore.
Bandon, Ore.
Brookings, Ore.
Crescent City, Calif.
Eureka, Calif.
San Francisco, Calif.

BRANDS

Pacific Fresh
Pacific Smoking Co.
Snow Mist
Sea Rock
Jake's Famous
Crawfish & Seafood
Newport Shrimp
Bandon Bay Fisheries
Bandon Fisheries
Bandon Gold
Ocean Fresh
S&S
Nemesis

Pacific Choice Seafood
1 Commercial St.
Eureka, CA 95501

November 4, 2016

Roxana Vargas
City of Eureka
4301 Hilfiker Lane
Eureka, CA 95503

RE: Notice of Violation/Corrective Action dated 10/31/2016

Dear Ms. Vargas:

As requested in the above referenced Notice of Violation, please accept our written response below:

We believe a new team member on our Sanitation Team may have been removing catch baskets from the drains before performing dry cleanup of all material. This issue has been addressed with said team member, as well as the entire Sanitation Team, to ensure the violation is not repeated in the future. Specific steps taken toward correcting the violation include:

1. All sanitation cleanings are monitored and documented. Heightened awareness has been implemented on dry clean up to prevent solids from going down the drains.
2. Training occurred with the sanitation teams on the evenings of 10/31/2016 and 11/1/2016. Please find attached documentation of training with this response.
3. Upon inspection of equipment on 10/31/2016, all baskets, sieves, and pumps were found to be operational and in good repair.
4. Additionally, we will be modifying all water flumes to better contain and flow shrimp shells to avoid contact with floor drains.

Please let me know if there are any questions,

John King
General Manager

Trainer Name: Andrew Perazich Title/Affiliation: Supervisor Interpreter Name: N/A

☒ Work Instructions, on Drain Cleaning
☒ Other Define: Time sheets and Time clock

[illegible]



CITY OF EUREKA
PUBLIC WORKS DEPARTMENT

531 K Street • Eureka, California 95501-1146 • Fax 707-441-4202
Administration: 707-441-4203 • Engineering: 707-441-4194
Building: 707-441-4155 • Utility Operations: 707-441-4364
publicworks@ci.eureka.ca.gov • www.ci.eureka.ca.gov

October 31, 2016

Pacific Choice Seafood
1 Commercial Street
Eureka, CA 95501

Dear Mr. John King,

RE: NOTICE OF VIOLATION/CORRECTIVE ACTION

Enclosed is a Notice of Violation regarding Wastewater Discharge Permit #37. Please be advised that to avoid administrative penalties, Pacific Choice Seafood must fully comply with all terms stated in this Notice. Administrative, civil, and criminal penalties for violations of pretreatment standards and requirements are described in the Eureka Municipal Code (EMC), Title 5, Chapter 50.

The City of Eureka has been noticing considerable amounts of shrimp waste in our headworks. The screening process of our effluent is trapping large amounts of shrimp shells from the recent discharges of shrimp wastewater from Pacific Choice Seafood. During my inspection on October 31, 2016, I was shown the shrimp process/steam area where rollers remove the shell and head of shrimp, where most of the shrimp waste is generated. General Manager John King, explained to me that the sanitation night crew might be removing the baskets on the sanitary floor drains in that area during cleaning, and therefore shrimp waste may be discharging into the sanitary sewer. This is a violation of section 50.020 of the EMC, which states that no person shall introduce or cause to be introduced into the POTW, directly or indirectly, any pollutant or wastewater which causes pass through or interference.

Pacific Choice shall submit to this office by 11/7/2016, a written response to this Notice which at a minimum addresses the following points:

1. The permittee shall attentively monitor and log all sanitation cleanings in the facility to verify all proper maintenance procedures are being performed.
2. The permittee shall implement a training system that incorporates acceptable sanitation methods and disposal of seafood waste. Records or logs of training sessions shall be documented.
3. At the permittee's expense, the permittee shall also replace defective baskets and screens on all the floor drains, to prevent accidental discharges of seafood waste into the sanitary sewer.

Your cooperation in resolving this matter is greatly appreciated. Please contact me at (707) 441-4011 if you have any questions or concerns regarding the Notice.

Sincerely,

Roxana Vargas
Source Control Inspector

COPY

Engineering
Construction
Development
Transportation

Field Operations
Water Distribution
Wastewater Collection
Equipment Operations

Building
Construction Regulation
Code Enforcement

Utility Operations
Water and Wastewater Treatment
Stormwater
Pretreatment

PACIFIC CHOICE SEAFOOD
NOTICE OF VIOLATION

LEGAL AUTHORITY

The following Findings are made and Order issued pursuant to the authority vested in the City of Eureka City Manager under the City of Eureka Municipal Code (EMC) Title 5, Chapter 50, Sewers. This Order is based on findings of violation of the conditions of the Wastewater Discharge Permit issued under Section 50.051 of the City's Municipal Code.

FINDINGS

1. The City of Eureka owns and operates a Publicly Owned Treatment Works which could be adversely impacted by discharges from Pacific Choice Seafood and other industrial users, and has implemented a pretreatment program to control such discharges.
2. Under this pretreatment program Pacific Choice Seafood was issued Wastewater Discharge Permit Number 37 on October 3, 2014 that contains prohibitions, restrictions, limitations and self-monitoring requirements related to the discharge of wastewater to the sanitary sewer.
3. Pursuant to the EMC and the above-referenced permit, data on the compliance status of Pacific Choice Seafood is collected by the City of Eureka.
4. This data shows that Pacific Choice Seafood has violated EMC Section 50.020(B), 50.055 and Wastewater Discharge Permit Number 37 in the following manner:
 - A. Shrimp waste was inadequately disposed of in the shrimp process area, and as a result was discharged into the sanitary sewer system.

PACIFIC CHOICE SEAFOOD IS HEREBY NOTIFIED THAT:

1. It is in violation of Wastewater Discharge Permit Number 37 and the Sewer Use Ordinance of the City of Eureka.
2. It is required to **notify this office in writing** within seven (7) working days of receipt of this Notice of the reason for the wastewater discharge violation, the action to be taken to correct the non-compliance violation, and the date the corrective action has been or will be implemented.
3. It is required to contact the City of Eureka within seven (7) working days of the corrective action implemented for item 4. A. (above) of the requirements outlined in the notification letter attached to this Notice.
4. Failure to respond within the time frames indicated will constitute a further violation of the Sewer Use Ordinance and may subject Pacific Choice Seafood to administrative fines in the amount of one thousand dollars (\$1000) per day per violation in accordance with section 50.123 (F) of the EMC.
5. This notice is effective upon receipt by Pacific Choice Seafood.
6. Correspondence regarding this notice shall be sent to:

Roxana Vargas
Source Control Inspector
City of Eureka
4301 Hilfiker Ln.
Eureka, CA 95503